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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF ARIZONA

11 United States of America

12 vs.

13
14 James B. Panther, Jr.,
a/k/a “James Suqui” and “James
15 Suquilanda,” and

16 Defendant.
17

Case No. 2:19-CR-448-2

**JOINT MOTION TO CONTINUE
TRIAL AND RULE 11 PLEA
HEARING**

18 The undersigned parties, by their respective attorneys, hereby submit this Motion to
19 Continue Trial and Rule 11 Plea Hearing and an accompanying proposed order for the
20 Court’s consideration.

21 On May 4, 2020, the parties notified the Court of the defendant’s intent to enter a
22 plea of guilty. A Rule 11 plea hearing was scheduled for July 21, 2020, and the trial date
23 was continued to August 4, 2020. Upon further review of the case file, the government
24 recently determined that items in its possession were not previously disclosed to the
25 defendant. The government recently sent a production of these materials to defense
26 counsel; anticipates sending an additional production in the coming weeks; and, if needed,
27 will send supplemental productions as its review of the case file continues. Accordingly,
28 the parties jointly request to continue the dates currently scheduled for trial and the Rule

1 11 plea hearing to September 2020 to allow the defendant time to review these materials.

2 The parties further request that this Court exclude the period of time from July 21,
3 2020 to the Rule 11 plea hearing from the Speedy Trial Act calculus pursuant to 18 U.S.C.
4 § 3161(h)(1)(G)) and (h)(7).

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7 Respectfully submitted,

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9 FOR PLAINTIFF
10 UNITED STATES OF AMERICA

FOR DEFENDANT
JAMES B. PANTHER, JR.

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13 By: s/Michelle Pascucci
14 Michelle Pascucci, Trial Attorney
15 Brittain Shaw, Trial Attorney

By: s/Dennis Burke
Dennis Burke, Esq.
Mark Kokanovitch, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on July 14, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification to counsel of record.

Respectfully submitted,

BY: /s/ Michelle Pascucci